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July 6, 2023

VIA CM/ECF

Honorable Thomas I. Vanaskie,
Special Master
Stevens & Lee, P.C.
1500 Market Street, East Tower
18th Floor
Philadelphia, Pennsylvania 19103

**RE: *In re Valsartan, Losartan, and Irbesartan Products Liability
Litigation, No. 1:19-md-02875***

Dear Judge Vanaskie:

I am writing on behalf of counsel for the ZHP defendants, Teva and Torrent (“defendants”), as well as counsel for plaintiffs (all of whom are copied on this letter), as a follow-up to my June 14, 2023 letter and Special Master Order No. 81, which established a briefing schedule for motions to seal materials submitted in connection with the parties’ *Daubert* briefing as well as earlier submissions related to the Court’s most recent order on confidentiality designations.

The parties have continued to confer diligently regarding confidentiality issues raised by certain exhibits to the *Daubert* briefing. Over the past few weeks, in connection with those continued discussions, the parties have reached a number of compromises that have narrowed the scope of disputed issues. Counsel for defendants and plaintiffs believe that allowing additional time for further negotiations would be productive and likely further winnow (and potentially eliminate) the issues that need to be litigated. Based on this belief, the parties

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discussed and agreed on the following revised schedule, which they respectfully submit for the Court's adoption:

- Defendants to file motions to seal by July 20, 2023.
- Plaintiffs to file opposition briefing by August 10, 2023.
- Defendants to file reply briefs by August 17, 2023.

In addition, the parties propose that oral argument be held at the mid-September status conference held by Your Honor via Zoom.

Thank you for your consideration.

Very truly yours,

A handwritten signature in blue ink, appearing to read 'Cox' with a stylized flourish.

Christopher Cox

Cc: Layne Hilton
Christopher Geddis
Steven Harkins
Brittany Nagle